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From: **Soto, Esteban** (Esteban.Soto@texasattorneygeneral.gov)
Sent: Wed 2/25/15 5:14 PM
To: Soraya Yanar Hanshew (syhlaw@outlook.com)
Cc: Taylor, Caroline (Caroline.Taylor@texasattorneygeneral.gov); Koren, Sharon (sharon.koren@texasattorneygeneral.gov)

Sure, we'll make our production by the end of next week. How about if (lets say) a week after that production you feel you need to make a follow up request for more documents that you think were missing, we agree to extend the deadline to allow us 30 days to respond. Does that make sense?

Esteban

From: Soraya Yanar Hanshew [mailto:syhlaw@outlook.com]
Sent: Wednesday, February 25, 2015 3:43 PM
To: Soto, Esteban
Cc: Taylor, Caroline; Koren, Sharon
Subject: RE: Robles v TTUHSC: Discovery Agreement

Esteban,

One other thing to add to be specific: It was agreed that Defendant will produce any and all documents that are not "privileged" related to Defendant's Disclosure Responses relatively soon.

Plaintiff will propound written discovery after reviewing said documentation, only if relevant documents and/or information is missing from Defendant's production.

Since our deadline for discovery will be April 1, can we agree that I may propound anytime in March since 30 days prior to our new deadline would require me to propound by Monday, and obviously I need to review your records first?

Soraya Yanar Hanshew
The Hanshew Law Firm, PLLC

632 Moondale Dr.
El Paso, Texas 79912
Phone: (915) 491-6181

Fax: (915) 996-9907

EXHIBIT "A"

Email: syhlaw@outlook.com

<http://www.hanshewlawfirm.com/>

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From: Esteban.Soto@texasattorneygeneral.gov
To: syhlaw@outlook.com
CC: Caroline.Taylor@texasattorneygeneral.gov; sharon.koren@texasattorneygeneral.gov
Subject: RE: Robles v TTUHSC: Discovery Agreement
Date: Wed, 25 Feb 2015 21:26:57 +0000

Sounds good. I'll keep you up to date. Esteban

From: Soraya Yanar Hanshew [<mailto:syhlaw@outlook.com>]
Sent: Wednesday, February 25, 2015 3:26 PM
To: Soto, Esteban
Cc: Taylor, Caroline; Koren, Sharon
Subject: RE: Robles v TTUHSC: Discovery Agreement

Got it Esteban. The Court will likely push our deadline if we mutually request it -- I agree that we should try to squeeze in our depositions before the ADR deadline.

Let me know next week what happens with your trial in the Valley, and if it's not going away, let's see about having the ADR deadline pushed a few weeks so we can maybe do depositions when your trial concludes?

Soraya Yanar Hanshew
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From: Esteban.Soto@texasattorneygeneral.gov
To: syhlaw@outlook.com
CC: Caroline.Taylor@texasattorneygeneral.gov; sharon.koren@texasattorneygeneral.gov
Subject: RE: Robles v TTUHSC: Discovery Agreement
Date: Wed, 25 Feb 2015 21:12:06 +0000

I have a trial scheduled in the Valley that week. I should have a better idea by the end of this week whether it will go or not. I'll let you know by next week. Likewise, if need be, I wouldn't be opposed to scheduling in April. The only issue is the mediation deadline...

Esteban

From: Soraya Yanar Hanshew [<mailto:syhlaw@outlook.com>]
Sent: Wednesday, February 25, 2015 3:01 PM
To: Soto, Esteban
Cc: Taylor, Caroline; Koren, Sharon
Subject: RE: Robles v TTUHSC: Discovery Agreement

This does Esteban. Thank you.

How does the week of March 23, 2015 look to you for depositions?

Soraya Yanar Hanshew
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From: Esteban.Soto@texasattorneygeneral.gov
To: syhlaw@outlook.com
CC: Caroline.Taylor@texasattorneygeneral.gov; sharon.koren@texasattorneygeneral.gov
Subject: Robles v TTUHSC: Discovery Agreement
Date: Tue, 24 Feb 2015 19:51:39 +0000

Soraya,

I'm writing to memorialize our agreement on extending the discovery deadline in *Robles*. It is my understanding that the parties have agree to:

An extension of the discovery deadline until April 1, 2015;

That Plaintiff would be made available for deposition during amended discovery period;

That Plaintiff would notify Defendants by early-March concerning the Defense witnesses Plaintiff will seek to depose; and

That Defendants will make a production of non-privileged documents reflected in their initial disclosures

Please let me know if this accurately reflects our agreement or if there was something I left out.

Thanks,

Esteban S.M. Soto

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